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May 11, 2011

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◆MEMBER OF NJ & NY BARS ▲MEMBER OF NJ & PA BARS

Via ECF

Re: New Jersey Title Insurance Company v.

National Union Fire Insurance Company of Pittsburgh (AIG/Chartis)

Civil Action No. 2:11-civ-630-DMC-JAD

Our File No. 4543-11615

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY Martin Luther King Jr. Federal Courthouse 50 Walnut Street, Room 5054 Newark, New Jersey 07101

Dear Sir/Madam:

This firm represents the Plaintiff, New Jersey Title Insurance Company in the above captioned matter. In accordance with Local Civ. R. 7.1(d)(5), we write to request an automatic extension to respond to the motion to dismiss filed by Defendant National Union Fire Insurance Company of Pittsburgh.

National Union filed its motion on April 25, 2011 with a return date of June 6, 2011. Currently, Plaintiff's response to the motion is due on May 23, 2011.

We request that the return date of the motion be adjourned to the next available return date, which is June 20, 2011. Accordingly, Plaintiff's response will be due June 6, 2011. Thank you for your attention to this matter.

Very truly yours,

Lisa J. Trembly

LJT:mr

cc: Honorable Dennis M. Cavanaugh, U.S.D.J. (via ordinary mail)

Richard S. Mills, Esq. (via ECF) Thomas J. Cahill, Esq. (via ECF)